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VIA ECF

Hon. Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Agudath Israel of America, et al. v. Cuomo*, No. 20-cv-04834 (E.D.N.Y.)

Dear Judge Matsumoto:

We are writing to advise the Court that the parties have made substantial progress and are very close to reaching a final resolution of the outstanding fees issue in this matter. The parties expect that they should be able to reach and document their final agreement in the coming weeks.

We therefore request an extension of time until June 4, 2021 to submit an application for attorneys' fees pursuant to Federal Rule of Civil Procedure 54. Counsel for Defendant consents to the extension of the deadline to file a fee application from May 7, 2021 through and including June 4, 2021. This is the fourth request for an extension of this deadline.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Schick".

Avi Schick